

# NOTICE

U.S. Department of Transportation  
**Federal Aviation Administration**

N 8120.15

4/19/94

Cancellation:  
Date: 4/19/95

SUBJ: HOT AIR BALLOON FABRIC

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1. PURPOSE: This notice defines the point at which hot air balloon fabric is considered to be an aeronautical part.

2. DISTRIBUTION: This directive is distributed to the Washington Headquarters division levels of the Flight Standards Service; and to branch levels of the Aircraft Certification Service and the Aviation Standards National Field Offices; to branch levels in the regional Flight Standards Divisions and Aircraft Certification Directorates; to all Flight Standards District Offices; to all Aircraft Certification Offices and Aircraft Certification Field Offices; to all Manufacturing Inspection District and Satellite Offices; to the Flight Standards Branch at the FAA Academy; to the Brussels Aircraft Certification Division; and to all International Aviation Field Offices.

3. BACKGROUND:

a. The United States Customs Service has recently had discussions with several members of the House Committee on Appropriations regarding the duty rate assigned to coated fabric used in hot air balloons. Specifically at issue is whether this fabric which forms the balloon envelope in this type of aircraft is classifiable as an "aircraft part."

b. In House Report 102-618, issued in fiscal year 1993, the Committee directed the Customs Service to consult with the FAA in an effort to determine how this specialized fabric should be defined.

4. GENERAL:

a. 14 CFR part 21.31(a) and (b) Type Design, state in pertinent part, "The type design consists of:

(1) The drawings and specifications, and a listing of those drawings and specifications, necessary to define the configuration and the design features of the product. . . ;

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(2) Information on dimensions, material, and processes necessary to define the structural strength of the product."

b. Product means an aircraft, aircraft engine or aircraft propeller;

c. Part thereof means any part, material, appliance, component, system, subassembly, or assembly used in a product.

5. DISCUSSION: The FAA considers a bolt of fabric to be raw material rather than an aircraft part. The fabric becomes an aircraft part when it conforms to the material requirements of Federal Aviation Regulation Part 31, and is cut into unique shapes as specified in the FAA-approved type design drawings.

6. ACTION TO BE TAKEN: The contents of this notice will be incorporated into the FAA directives system and the appropriate advisory circulars.

/S/  
Michael Gallagher  
Manager, Aircraft Manufacturing  
Division